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November 9, 1983

Re: National Gypsum Company
EPA Request for Information

Mr. Robert McKnight
Hazardous Waste Site Branch
U.S. Environmental Protection Agency
Region II
Room 402
26 Federal Plaza
New York, New York 10278

Dear Mr. McKnight:

We enclose the response of National Gypsum Company to Information Request. The Information Request accompanied the October 3, 1983 letter to us from William J. Librizzi, which we received on October 12, 1983. In our telephone conversation of last week, you had agreed to extend for one week the time for the company to respond.

In providing this response, National Gypsum does not concede that it handled hazardous waste within the meaning of the statutes cited in Mr. Librizzi's letter. However, it is providing the information in the spirit of cooperation requested by his letter. We trust that you will find the response to be adequate.

Very truly yours,

William T. Reilly
William T. Reilly

WTR:ctw
enclosure

- NAT. GYP. RESPONSE TO INFO REQUEST -

ASB 002 0242

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RESPONSE OF NATIONAL GYPSUM
COMPANY TO INFORMATION REQUEST

1. National Gypsum is not a division or subsidiary of another corporation.
2. National Gypsum has not referred to site as the Millington Asbestos Dump Site Property, and does not concur in the use of the term or whatever implications it may bear. In answering this and subsequent questions, National Gypsum interprets the use of the term "the site" as referring to the property it previously owned in Millington, New Jersey, along Division Avenue.

Asbestos fiber, portland cement, calcium carbonate, and in some products, sand and color pigments were dry mixed thoroughly before being mixed with water. Sufficient water was added to provide a 15-25% concentration of solids. This material went to a stock chest and was fed into molds or vats. The process here is similar to a paper machine. A felt would pass through the molds and pick up the material with the aid of vacuum boxes. The material was then wrapped around an accumulator roll until the desired thickness was obtained. From there, the sheet was cut off the accumulator roll and laid flat on a conveyor for processing.

The wet sheets were trimmed, cut, embossed and punched depending upon the finished product desired. Excess surface moisture was removed by drying. The sheets were then stacked and placed in an autoclave under steam pressure for about 8 hours to cure. The material was then coated, dried and packaged.

Finished products produced were asbestos cement sheets (4' x 8', 9', 10') and asbestos cement shingles (12"x24", 9"x32", 14 3/4"x 32").

Most waste generated by this process was recaptured and recycled, and only the remainder went to disposal. The waste water was first passed through screens to collect asbestos and then through a Sav-All system (centrifugal reclamation system) to reclaim other solids. Only the very fine suspended particles were contained in the water discharged to settling ponds. Any asbestos gathered on the screens and the solids reclaimed in the Sav-All system were put back into the process at the wet mixing tank. All dry waste from the punching and trimming process as well as damaged finished product was reground and fed back into the dry mix tanks.

National Gypsum shutdown operations at the plant in April-May 1975.

3. Hazardous substances were not disposed of by National Gypsum Company at the site. Attached are copies of affidavits by Michael Mironick, George Reilly, Lawrence Rothlisberger and Henry Berg that were presented to N.J.D.E.P. in 1977 pertaining to the site.

4, 5, 6, 7 - N/A

8. While National Gypsum does not know whether they were hazardous substances, it does know that material (apparently asbestos waste) was disposed at the site by the immediate prior owner of the facility (Smith Asbestos Products, Inc., 270 Park Avenue, New York, New York) and perhaps other owners.

It appears that a company, known as Asbestos Limited, Inc., was started in 1919 by Nathan F. Newman and was engaged in the fiberizing and sale of asbestos originally at a plant in Bound Brook, N.J. In 1924, this plant was destroyed by fire and a new plant was built for this company in Millington at the site. This company was incorporated in 1924 under a New York charter under the same name. Mr. Newman was the president until his death in 1945. The business was continued for about a year by the trustees for his estate, and then sold outright to Bernard E. Smith, and it was operated by Smith Asbestos Products, Inc.

Ownership of the Millington property was transferred by deed dated May 6, 1953 from Smith Asbestos Products Inc. to National Gypsum Company. The plant was operated by National Gypsum until April-May 1975, at which time the operation was closed. By deed dated June 1, 1978, ownership was transferred by National Gypsum Company to Tifa, Ltd.

9. National Gypsum Company has not conducted any studies or investigations into the hydrology and/or geology of the site.
10. Waste from National Gypsum Company's asbestos cement manufacturing operation at the site, not recycled in the manufacturing process, was transported off site. It is questionable whether this material was hazardous. There were no records kept on the amount of material removed or on its content. Two retired employees (George Reilly, the Plant Manager, and Lawrence Rothlisberger, the Plant Superintendent) were interviewed to obtain the information supplied in this response. Mr. Reilly's and Mr. Rothlisberger's recollections were used to provide the estimates contained in this response.

The wastes involved were primarily from cleaning sludge from one of the two primary settling ponds or lagoons (shown on the accompanying map used for obtaining NPDES permit number NJ0002429). Approximately once a month, the water stream from the plant would change from one lagoon to the other. After

1-2 weeks, the first lagoon would be cleaned and the sludge was trucked to off premises dump sites. The quantity involved was estimated to be 200-250 tons per year of wet sludge. It is estimated that the sludge in a dry state would contain less than 1% asbestos by weight. The only known tests of this material were performed in 1977 by the Board of Health at the request of some residents in the area. Those tests revealed less than 100 parts per million of asbestos. A newspaper article of these tests is attached and possibly the Board of Health still has copies of the test - we do not.

The first off-site location used by National Gypsum was owned by Carmen Montesano and involved 3 lots on Union Avenue, Sterling, N.J. In 1963, disposal was moved to property owned by N. Deitzman, Harding Township, Meyersville, N.J. Nick Deitzman hauled the waste.

In 1968, disposal changed to property owned by Charles A. Hopkins at 237 New Vernon Road, Meyersville, N.J. The final off-site area began in 1971 and was owned by David C. Major, 651 White Bridge Road, Meyersville. Also, sometime in the late 1960's or early 1970's, the Town of Sterling used the material to fill in a pond created by an abandoned clay pit.

Fox Hauler Nursery, owned by a man named Carrasino, was the contract hauler used when the plant shut down.

11. & There was a small pit located adjacent to the area labeled
12. "tank farm" on the NPDES permit map. This pit was used to contain the discharge when the acrylic spray coating booth was cleaned. This cleaning occurred once/day and occasionally when a color change was required midshift. The amount of paint in the water was very small and was estimated to be less than one gallon per cleaning. This water evaporated or soaked into the dirt leaving a dry to semi-dry residue of coating. On an annual basis, we estimate that between 1500 and 3000 pounds of coating entered this pit.

Mr. Reilly recalls the pit may have been cleaned once, and Mr. Rothlisberger thinks it might have been cleaned once or twice.

Coatings were used from mid 1958 until the plant shutdown in April-May, 1975. Phenylmercuric acetate (PMA) was used in the coatings from the end of 1959 until 1972 - approximately 13 years. The PMA was 0.48% of the coating. Therefore, it is estimated that 7.2 to 14.4 pound of PMA went to the cleaning pits each year. PMA was received in drums and the empty drums were returned to the vendor.

13. National Gypsum Company instituted an action against Tifa, Ltd. to foreclose a mortgage on the property in Millington. Tifa asserted a counterclaim for damages alleging that it had incurred expenses for repairs and had lost two prospective tenants because of the presence of asbestos on the site. National Gypsum and Tifa have agreed to a settlement of the lawsuit, which should be dismissed in the very near future. The case is captioned National Gypsum v. Tifa, Ltd., Superior Court of New Jersey, Chancery Division: Morris County, Docket No. F-9239-81.

CERTIFICATION OF ANSWERS TO REQUEST FOR INFORMATION

I certify that the foregoing answers and supporting documentation to the EPA Request for Information are true, complete and accurate to the best of my knowledge and belief.

R. G. Walker

Printed Name of Person Signing



Signature

Director of Mining and
Environmental Services

Title

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